## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANAYA WASHINGTON, individually and on behalf of all others similarly situated,

Case No. 1:24-cv-02327-ALC

Plaintiff.

ORAL ARGUMENT REQUESTED

v.

REYNOLDS CONSUMER PRODUCTS LLC,

Defendant.

## DEFENDANT REYNOLDS CONSUMER PRODUCTS LLC'S NOTICE OF MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Reynolds Consumer Products LLC's ("Reynolds") Motion to Dismiss Plaintiff's First Amended Class Action Complaint, dated July 22, 2024, and all other documents submitted therewith, for good cause shown, the undersigned will move before this Court, the United States District Court for the Southern District of New York, before the Honorable Andrew L. Carter, Jr., at the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, NY 10007, at a time and place to be scheduled by this Court, pursuant to Fed. R. Civ. P. 12(b)(6) for an order dismissing the First Amended Complaint in its entirety and for such other and further relief as the Court may deem just and proper. Reynolds respectfully requests oral argument on its motion.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff's opposition to this motion is due on August 21, 2024, and Reynolds's reply is due September 11, 2024. *See* Dkt. 11.

Dated: July 22, 2024 Respectfully submitted,

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<sup>\*</sup> Pro Hac Vice application forthcoming